

BQC 93-070

Date: December 9, 1993

To:	Nursing Homes	NH	<u>36</u>
	Facilities for the Developmentally Disabled	FDD	<u>26</u>
	Hospitals	HOSP	<u>27</u>
	Ambulatory Surgical Centers	ASC	<u>6</u>

From: Judy Fryback, Director  
Bureau of Quality Compliance

Subject: Life Safety Code Regional Program Letter No. 93-11 & 12

Attached are copies of the Life Safety Code Regional Program Letters numbered 93-11 and 93-12, from the Health Care Financing Administration Region V, Division of Health Standards and Quality.

Program Letter No. 93-11 provides interpretive guidelines related to the extent and content of exit discharges. This information is shared with you to ensure consistent application of the Life Safety Code. The surfacing material required for the exit discharge may be new information to you. This information should be shared with appropriate staff.

Program Letter No. 93-12 clarifies information regarding sprinklers in closets. Please share this information with the appropriate staff.

Both transmittals apply to all of the Life Safety Codes for certification purposes (i.e., 1967, 1973, 1981, and 1985). If you have any questions, please contact Stephen D. Schlough, P.E., Chief, Hospital and Health Services Section at (608) 266-3878.

JF/SDS/JJF/df

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cc: -BQC Staff	-WI Health Info. Mgmt. Assn.
-Office of Legal Counsel	-Commission on Geriatric Health
-Ann Haney, DOH Admin.	-WI Assn. of Nursing Homes
-Kevin Piper, BHCF Dir.	-WI Assn. of Medical Directors
-HCFA, Region V	-Admin., Division of Care and Treatment Facilities
-Illinois State Agency	-WI Assn. of Hospital SW and Discharge Planners
-Ohio State Agency	-Bd. on Aging & Long Term Care
-Michigan State Agency	-Bur. of Design Prof., DRL
-Indiana State Agency	-WI Hospital Association
-Minnesota State Agency	-LTC BQC Memo Subscribers
-WI Coalition for Advocacy	-Non-LTC BQC Memo Subscribers
-Serv. Employees Internat'l Union	-Mark Bunge, BPH
-WI Counties Assn.	
-WI Assn. of Homes & Serv/Aging	

Department of Health & Human Services  
Health Care Financing Administration  
Region V  
105 West Adams Street  
15<sup>th</sup> Floor  
Chicago, Illinois 60603-6201

September 1993

Refer to: CR24

**LIFE SAFETY CODE REGIONAL PROGRAM LETTER No. 93-11**

**Subject: Interpretive Guidance on Life Safety Code (LSC) Provision for Exit Discharges**

The purpose of this memorandum is to transmit to you the enclosed interpretive guidance related to the extent and content of exit discharges.

In order to assure consistent application of the LSC requirements across our region, please share this information with the Fire Authorities in your State.

If you have any questions please contact our Regional Engineer, Winston Dawson at (312) 353-2852.

/s/ Winston Dawson  
Regional Engineer  
Survey and Certification Review Branch  
Division of Health Standards and Quality

/s/ Charles Bennett  
Branch Chief  
Survey and Certification Review Branch  
Division of Health Standards and Quality

ADDITIONAL GUIDANCE TO SURVEYORS  
LIFE SAFETY CODE (LSC)

Date	Tag	Additional Interpretive Guidance
07/07/93	K 32	<p style="text-align: center;">LSC Chapter 5-7.1 (1985)</p> <p style="text-align: center;">EXITS AND EXIT ACCESS</p> <p><u>Issue:</u> Must the exit discharge extend from the exit door to the public way?</p> <p><u>Response:</u> Yes, the exit discharge must extend from the exit door to the public way (usually this is to the street).</p> <p><u>Issue:</u> If the exit discharge is not required to extend from the exit door to the public way, how far from the building is the exit discharge required to extend?</p> <p><u>Response:</u> The LSC permits the path of safe access to terminate in a parking lot, or at a point large enough for all occupants to congregate, if it is sufficiently far from the building, so that a fire will not pose a hazard to evacuated occupants – perhaps 30 or 35 feet. In this case, a waiver would be necessary since the facility meets the intent but not the letter of the LSC. Again, the length of the path of safe access is a judgement call by the Medicare State Fire Authority official.</p> <p><u>Issue:</u> Must an exit discharge be surfaced with material other than grass and or soil?</p> <p><u>Response:</u> Yes, if there is much rain or snow and if patients are expected to exit or be evacuated in wheelchairs or beds.</p> <p><u>Issue:</u> What factors can be used to determine whether or not surfacing of the exit discharge (e.g., a sidewalk) is required?</p> <p><u>Response:</u> Although a sidewalk is not required explicitly, it may be required if in the judgement of the surveyor there are changes in elevation or climatic conditions (such as rain or snow) which would render a yard or unpaved area unusable. It may be difficult if not impossible for a person in a wheelchair to reach a public way through a dirt yard or unpaved area after a rainy day.</p> <p><u>Issue:</u> What materials are acceptable for surfacing purposes?</p> <p><u>Response:</u> In some cases, gravel may be sufficient; in other cases, asphalt or concrete may be necessary.</p> <p><u>Issue:</u> Does the answer to any of the above change if the 1985 edition of the NFPA 101 (LSC) is used?</p> <p><u>Response:</u> No. Formal Interpretation 81-33 is an interpretation of the 1981 LSC. The interpretation stands for the 1985 and 1991 LSC.</p> <p>/s/ Anthony J. Tirone, Director Office of Survey and Certification HSQB/HCFA</p>

Department of Health & Human Services  
Health Care Financing Administration  
Region V  
105 West Adams Street  
15<sup>th</sup> Floor  
Chicago, Illinois 60603-6201

September 8, 1993

Refer to: CR24

**LIFE SAFETY CODE REGIONAL PROGRAM LETTER No. 93-12**

**Subject: Sprinklers in Closets**

Our Central Office in Baltimore has received several inquiries regarding sprinklers in closets, in facilities surveyed under the Health Care Occupancies chapter of the Life Safety Code (LSC) written by the National Fire Protection Association (NFPA). The purpose of this program letter is to clarify our position with respect to sprinklers in closets.

NFPA 13, Standard for the Installation of Sprinklers, requires that a building be sprinklered throughout. The Standard is very specific in permitting the omission of sprinklers under certain circumstances. The following principles represent the Health Care Financing Administration's policy with regard to sprinklers in closets:

- Free-standing wardrobes are considered FURNITURE. Furniture need NOT be sprinklered.
- Wardrobes which are permanently affixed to the walls and closets must be covered by sprinklers, although not necessarily provided with sprinkler heads inside the closet.
- There are alternatives to putting sprinkler heads inside a closet or permanent wardrobe, as follows:
  - ❖ Remove the top of the wardrobe so that the spray from the nearest sprinkler head can cover the wardrobe;
  - ❖ Remove the door to the closet or wardrobe;
  - ❖ Replace the solid door with a louvered door;
  - ❖ Make a determination that the closet or wardrobe is so small in size AND has such a small fuel load that any fully developed fire would be unlikely to occur and could be controlled by a head outside the closet (a waiver would be necessary;)
  - ❖ Provide one or two additional sprinkler heads OUTSIDE the closet to serve as a water curtain and protect the opening to the closet; or
  - ❖ Utilize the Fire Safety Evaluation System (FSES) and give 8 points credit (instead of 10) for sprinklers in corridors and habitable spaces. A closet is NOT a habitable space and need not be sprinklered to qualify for the 8 points; in order to qualify for 8 points, there are two conditions which must be met (see Page 224, FSES instructions, 1985 LSC):
    1. the building must be of protected construction (with appropriate fire resistance ratings on structural elements) or, if unprotected construction, all unsheathed elements must be sprinklered, AND

2. the spray of existing sprinklers must be such that there is little likelihood of a fire getting from the unsprinklered space to the sprinklered space (either the size of the closet or wardrobe is very small, or there is a water curtain outside the closet.)

It is not necessary to take the tops off of all wardrobes, or require that all closets and wardrobes be sprinklered. In deficient situations, State agencies or State fire authorities are to allow providers a choice to correct from among the several options.

Please share this information with your State Agency and State Fire Authority Officials for dissemination to all LSC surveyors.

If you have any questions please contact our Regional Engineer, Winston Dawson at (312) 353-2852.

/s/ Winston Dawson  
Regional Engineer  
Survey and Certification Review Branch  
Division of Health Standards and Quality

/s/ Charles Bennett  
Branch Chief  
Survey and Certification Review Branch  
Division of Health Standards and Quality